Seymour Wasserstrum, Esq. SW2734 Law Offices of Seymour Wasserstrum Attorney at Law 205 W. Landis Avenue Vineland, NJ 08360 (856) 696-8300 Attorney for Debtor

## UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

IN RE: Barbara Calisti Case No: 11-19182/JHW

Chapter 7

## NOTICE OF MOTION TO REOPEN CHAPTER 7 CASE TO AMEND SCHEDULE F

HEARING DATE: August 4, 2020 at 10:00 a.m.

**To:** Andrew Sklar

102 Browning Road Building B - Suite 1 Cherry Hill, NJ 08003

## ALL CREDITORS

(and their counsel – see attached list)

**PLEASE TAKE NOTICE** that on 4<sup>th</sup> of August 2020 at 10:00 a.m., the undersigned, attorney for Debtor, will make application to this Honorable Court for an Order to Reopen Debtor's Chapter 7 Case to Amend Schedule F.

**PLEASE TAKE FURTHER NOTICE** that the undersigned shall rely upon the attached Certification of Barbara Calisti, exhibit annexed hereto, the arguments of counsel and such other and further proofs as may be adduced at the hearing hereof.

**PLEASE TAKE FURTHER NOTICE** that the moving party believes that no brief is necessary in support of the within application due to the fact that the matter involves no complex issues of law or fact.

PLEASE TAKE FURTHER NOTICE that if you wish to contest the within Motion, you

must file opposition with the office of the Clerk of the Bankruptcy Court, and serve

the undersigned, 7 days in advance of the aforesaid hearing, your responding papers stating with

particularly the basis of your opposition to the within Motion. A copy of the proposed Order which

is sought is enclosed with this Motion.

Dated: 07/09/2020 /s/ Seymour Wasserstrum, Esq

Seymour Wasserstrum, Esq.

**Attorney for Debtor**